

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

STEVEN KNURR, Individually and on Behalf)	Civil Action No. 1:16-cv-01031-TSE-MSN
of All Others Similarly Situated,)	
Plaintiff,)	<u>CLASS ACTION</u>
vs.)	
ORBITAL ATK, INC., <i>et al.</i> ,)	
Defendants.)	
_____)	

PLAINTIFFS' MOTION TO COMPEL DELOITTE LLP WORKPAPERS

Lead Plaintiff Construction Laborers Pension Trust of Greater St. Louis and Named Plaintiff Wayne County Employees' Retirement System ("Plaintiffs") bring this motion to compel Orbital ATK, Inc. ("Company") and non-party Deloitte, LLP ("Deloitte") to produce the unknown number of Deloitte workpapers responsive to Plaintiffs' document requests to Deloitte that have been withheld from production or produced in a redacted form based on an assertion of privilege by the Company for which there is no privilege log. The grounds and reasons for granting this relief are stated with particularity in the accompanying memorandum of law. A proposed order is submitted herewith.

The undersigned certifies that a good faith effort was made to resolve the issues set forth in this Motion in accordance with Local Civil Rules 7(E) and 37(E).

DATED: June 25, 2018

THE OFFICE OF CRAIG C. REILLY
CRAIG C. REILLY, VSB #20942

/s/ Craig C. Reilly

CRAIG C. REILLY

111 Oronoco Street
Alexandria, VA 22314
Telephone: 703/549-5354
703/549-2604 (fax)
craig.reilly@ccreillylaw.com

Liaison Counsel

ROBBINS GELLER RUDMAN
& DOWD LLP
SAMUEL H. RUDMAN
58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)

ROBBINS GELLER RUDMAN
& DOWD LLP
JAMES E. BARZ
FRANK RICHTER
200 South Wacker Drive, 31st Floor
Chicago, IL 60606
Telephone: 312/674-4674
312/674-4676 (fax)

ROBBINS GELLER RUDMAN
& DOWD LLP
JOHN C. HERMAN
PETER M. JONES
Monarch Tower, Suite 1650
3424 Peachtree Road, N.E.
Atlanta, GA 30326
Telephone: 404/504-6500
404/504-6501 (fax)

ROBBINS GELLER RUDMAN
& DOWD LLP
MAUREEN E. MUELLER
KATHLEEN B. DOUGLAS
120 East Palmetto Park Road, Suite 500
Boca Raton, FL 33432
Telephone: 561/750-3000
561/750-3364 (fax)

Lead Counsel for Plaintiff

VANOVERBEKE MICHAUD &
TIMMONY, P.C.
THOMAS C. MICHAUD
79 Alfred Street
Detroit, MI 48201
Telephone: 313/578-1200
313/578-1201 (fax)

***Additional Counsel for Plaintiff Wayne County
Employees' Retirement System***

CERTIFICATE OF SERVICE

I hereby certify that on June 25, 2018, I filed the foregoing pleading or paper through the Court's CM/ECF system, which sent a notice of electronic filing to all registered users and the following counsel for Deloitte, LLP:

Michael D. Warden, Esq.
Sidley Austin LLP
1501 K Street, N.W.
Suite 600
Washington, D.C. 20005
mwarden@sidely.com

/s/ Craig C. Reilly

Craig C. Reilly, Esq.
VSB # 20942
111 Oronoco Street
Alexandria, Virginia 22314
TEL (703) 549-5354
FAX (703) 549-5355
EMAIL craig.reilly@ccreillylaw.com

Liaison Counsel for Lead Plaintiff